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FROM: J. Tyler McCauley *lm*  
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SUBJECT: **DEPARTMENT OF COMMUNITY AND SENIOR SERVICES REFUGEE  
EMPLOYMENT PROGRAM REVIEW**

Attached is our report on the Department of Community and Senior Services (CSS) Refugee Employment Program (REP). The Refugee Act of 1980 created the refugee resettlement program to provide for the effective resettlement of refugees and to assist them to achieve economic self-sufficiency as quickly as possible after arrival in the United States. CSS has contracts with 13 agencies to provide case management, training and job placement services to eligible participants. As of March 2002, over 4,600 refugees were being helped through REP. The Program's federal fiscal year 2001-2002, budget is \$5.7 million.

**Objective and Methodology**

The objective of our review was to determine if CSS' REP achieves its program goals. As part of our review, we compared the program's performance against established performance goals and against programs of other California counties receiving refugee funding. We also reviewed CSS' process for contracting and monitoring REP service providers. In addition, we interviewed CSS management and program staff, REP service providers, and California Department of Social Services representatives. Finally, we reviewed federal legislation and relevant CSS policies and program data.

### **Summary of Findings**

CSS' management and staff appear dedicated to the success of REP. CSS has developed performance measures and goals for the program. CSS management monitors the performance of the service providers quarterly, adjusts funding and provides assistance to ensure goals are met. Further, two program monitors work full-time monitoring the 13 service providers. However, during our review we noted areas where CSS can further improve its REP operations. Below is a summary of the most significant findings.

#### **Performance Measures**

The federal Office of Refugee Resettlement (ORR) uses six performance measures to track the effectiveness of all ORR funded refugee programs operating in the United States. CSS develops annual performance goals based on the six performance measures. During federal fiscal year 2000-01, CSS met four of the six performance goals it established. However, we compared the performance of CSS to other California counties and found that, in two performance measures, CSS performed below most other counties. CSS should compare and contrast their operating policies and procedures with other counties to determine if there are ways to further improve Los Angeles County's REP.

We also noted that CSS has not established clear and measurable performance criteria for all its program goals. For example, CSS has no measurable criteria for providing outreach and information to refugees about social service programs that would enhance their ability to overcome barriers to isolation. Without these performance criteria, CSS cannot effectively evaluate the success of REP or identify problem areas for corrective action.

#### **Monitoring Agency Performance**

CSS developed a monitoring manual to assist CSS program monitors in their agency reviews. The manual needs to be revised to specifically identify how and the number of agency case files that should be selected. Program monitors currently randomly select files. Because site visits are limited to one day, program monitors sometimes review as few as two case files. Reviewing such a small sample and not selecting specific types of cases makes it difficult to determine the degree to which the contractor is or is not complying with their County contract.

CSS also needs to improve its compliance with its internal contract monitoring policies. CSS' policies require program monitors to visit each contractor site at least once a quarter. During the quarter ending March 2002, CSS program monitors visited only 22 (67%) of the 33 agency sites.

**Contracting Process**

In 2001, the Department issued a new Request for Proposals (RFP) to potential contractors with the knowledge base and experience in delivering social and employment training services to refugees. Overall, we found CSS' RFP process to be efficient and objective. However, we noted that the teams that evaluated the individual proposals were only composed of two members and each team reviewed a maximum of three of the 17 proposals received. Assigning only two evaluators to a team could result in conflicting scores without a third score to provide a majority. Not having the same team review all of the proposals could lead to inconsistencies in the overall proposal evaluation process. CSS management should assign a minimum of three staff to the evaluation team and require each member of the team to evaluate each proposal. If the number of proposals is too large, management should consider having the panels each evaluate a separate component of each proposal. The review process should be closely supervised to ensure consistency. Team members should also receive comprehensive instruction on the use of the evaluation instrument and rating criteria.

**Claiming**

CSS receives RESS, TA and Asylee Set-Aside funding each federal fiscal year. For federal fiscal year 2001-02, CSS was allocated over \$5.7 million to provide outreach, case management, employment/training and placement services to refugees and asylees. A portion of each allocation is set aside for administrative expenditures. We noted that CSS management made several adjustments to their administrative expenditures, which creates perceptions that the Department arbitrarily applies expenditures to maximize the claiming of administrative costs. Additionally, CSS is not submitting reimbursement claims until an average of 200 days after the service month. Monitoring expenditures to ensure they are accurately recorded and submitting claims more timely will enhance the County's cash flow and facilitate program monitoring.

Details of these and other findings are included in the attached Comments and Recommendations section of the report.

**Review of Report**

CSS management and staff were cooperative during our review and actively participated in the review process. The Department's written response (attached) indicates overall agreement with our recommendations and that the Department has taken action to address five of the weaknesses identified.

If you have any questions regarding this report, please contact me or have your staff contact DeWitt Roberts at (213) 974-0301.

JTM:DR:MC  
CSS REP COVER

**Attachments**

- c: David E. Janssen, Chief Administrative Officer  
Department of Community and Senior Services
  - Robert Ryans, Director
  - Josie Marquez, Employment & Training Director
  - Kenneth Kessler, Finance Director
  - Violet Varona-Lukens, Executive Officer
  - Public Information Office
  - Audit Committee

## TABLE OF CONTENTS

BACKGROUND.....	1
OBJECTIVE AND METHODOLOGY.....	2
MEASURING PROGRAM PERFORMANCE .....	2
<i>Office of Refugee Resettlement Performance Measures</i> .....	2
<i>Output/Outcome Measures</i> .....	5
PROGRAM MONITORING .....	5
<i>Frequency of Site Visits</i> .....	6
<i>Case File Reviews</i> .....	6
<i>Monitoring Agency Training Sessions</i> .....	8
<i>Activity Logs</i> .....	9
<i>Agency Policy Manual</i> .....	10
CONTRACTING PROCESS .....	10
<i>Evaluation Scoring Process</i> .....	11
<i>RFP Evaluation Teams</i> .....	12
<i>Accuracy of Scores</i> .....	12
<i>Contract Renewals</i> .....	13
<i>Funding and Contract Awards</i> .....	13
CLAIMING .....	14
<i>Delays in Claiming</i> .....	14
<i>Monitoring Administrative Expenditures</i> .....	15
REFUGEE EMPLOYMENT PROGRAM AGENCY COMPONENTS.....	16

**Department of Community and Senior Services  
Refugee Employment Program Review**

**Comments and Recommendations**

**Background**

The Refugee Act of 1980 created the refugee resettlement program to provide for the effective resettlement of refugees and to assist them to achieve economic self-sufficiency as quickly as possible after arrival in the United States. The Refugee Act made possible federal funding sources – Refugee Employment Social Services (RESS), Targeted Assistance (TA) and Asylee Set-Aside to provide services to refugees residing in the United States five years or less and asylees at the point they are granted asylum

The County of Los Angeles created a Refugee Employment Program (REP) and gave the Department of Community and Senior Services (CSS) Office of Refugee Assistance operating and oversight responsibilities. The Department of Public Social Services refers potential REP participants to CSS. CSS has contracts with 13 agencies to provide case management, training and job placement services to eligible participants. The eligible participants include refugee and asylee recipients of the California Work Opportunity and Responsibility to Kids, General Relief and Refugee Cash Assistance programs. As of March 2002, CSS' REP had over 4,600 participants.

For federal fiscal year 2001-2002, CSS received an initial allocation of \$5.7 million in RESS, TA and Asylee Set-Aside funding for its REP. CSS also had about \$660,000 in available funding carried over from the previous federal fiscal year.

CSS has developed the following goals for REP:

- Reduce, and eventually eliminate dependency on public assistance.
- Enhance a participant's career through mentoring, vocational assessment, and employer linked training.
- Place participants in full time, unsubsidized jobs.
- Provide outreach and information about social service programs that enhance a refugee's ability to overcome barriers to isolation and dependency on public assistance.

### **Objective and Methodology**

The objective of our review was to determine if CSS' REP achieves its program goals. As part of our review, we compared the program's performance against established performance goals and against programs of other California counties receiving refugee funding. We also reviewed CSS' process for contracting and monitoring REP service providers. In addition, we interviewed CSS management, program staff, REP service providers, and California Department of Social Services representatives. Finally, we reviewed federal legislation and relevant CSS policies and program data.

### **Measuring Program Performance**

#### **Office of Refugee Resettlement Performance Measures**

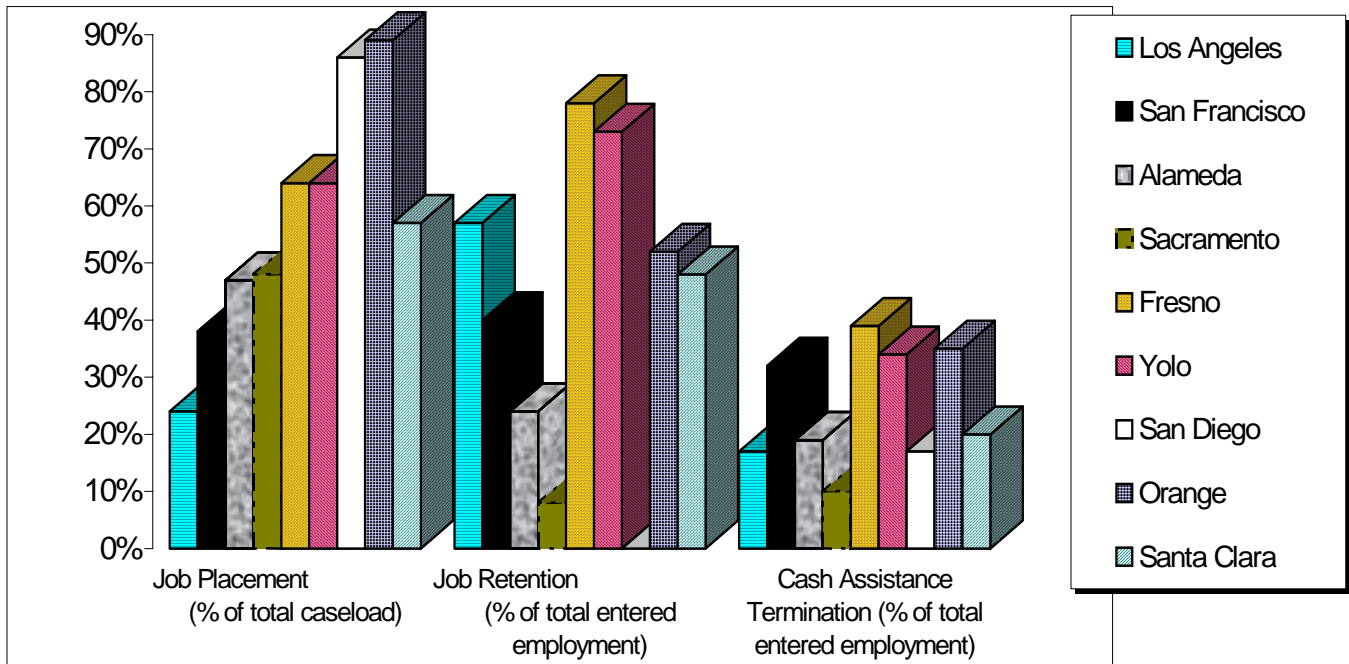
The federal Office of Refugee Resettlement (ORR) established six performance measures to track the effectiveness of all refugee programs operating within the United States that receive federal funding. The ORR requires all counties that receive funding to develop annual performance goals based on the six performance measures indicated below:

1. Number of participants that entered employment
2. Number of participants that entered employment that contained health benefits
3. Number of participants that retained their employment for 90 days
4. Number of participants that terminated their cash assistance
5. Number of participants that reduced their cash assistance
6. Average hourly wage

CSS develops its performance goals based on a review of the current number of refugees in the program and their length of time in the program. CSS also uses information obtained from the ORR regarding the number of refugees expected to arrive in California. CSS management monitors the performance of their service providers quarterly, adjusts funding and provides assistance to ensure goals are met. As a result, in federal fiscal year (FFY) 2000-01, CSS met or exceeded four of the six ORR performance goals it established.

We selected three of the ORR performance measures (i.e., Job Placement, Job Retention and Cash Assistance Termination) and compared Los Angeles County's performance (as reported to the State) during FFY 2000-01 to all counties within California that received refugee funding. As shown on the chart on the next page, Los Angeles County reported a higher success rate in the area of Job Retention than several other California counties.

**Federal Fiscal Year 2000-01 Performance in Three Areas**  
**By all California Counties that Received Funding**



However, in the areas of Job Placement and Cash Assistance Termination, CSS reported a lower success rate than other counties. Because most counties have a much smaller REP than Los Angeles County, this may not be a fair comparison. We discussed this with CSS management, as well as State representatives, and were told that Sacramento County is the most comparable county to Los Angeles given Sacramento's similarity in number of participants and the diversity of its refugee population. Using all six performance measures currently tracked by the ORR, we compared the actual performance of Los Angeles and Sacramento Counties during the last three federal fiscal years.



**Los Angeles and Sacramento Actual Performance**  
**During the last three Fiscal Years**

Performance Measure	FFY 00/01		FY 99/00		FY 98/99	
	LA	Sac	LA	Sac	LA	Sac
Entered Employment	24%	48%	33%	54%	22%	66%
Entered Employment with Health Benefits	11%	18%	16%	31%	23%	43%
90-Day Employment Retentions	57%	13%	49%	29%	54%	70%
Cash Assistance Reductions	12%	22%	5%	68%	22%	35%
Cash Assistance Terminations	17%	17%	10%	8%	7%	19%
Average Hourly	\$6.89	\$7.82	\$6.89	\$7.32	\$6.81	\$6.39

The shaded boxes indicate where Los Angeles County has outperformed Sacramento. Los Angeles County does a better job of placing participants into jobs where the participant retains the job for at least 90 days. Sacramento County places a higher percentage of participants into employment (both with and without health benefits) and also places participants into jobs with a higher average hourly wage.

We contacted the Sacramento Employment and Training Agency (SETA), the agency responsible for planning and administering the refugee grants in Sacramento County, to gain a greater understanding of the types of employment programs offered by Sacramento County. In reviewing Sacramento County's employment programs, we noted that Sacramento County offers core services similar to those in Los Angeles County (Attachment I lists Los Angeles County's service components). However, Sacramento County's employment program has fewer components with longer life cycles. For example, SETA's direct employment component runs a minimum of six months. Los Angeles offers a three month employment component after a participant completes a minimum of four consecutive weeks of job search training.

Because several counties, including Sacramento, appear to be outperforming Los Angeles in several areas, we recommend that CSS compare and contrast their operating policies and practices with these counties in an effort to find ways to improve the performance of the REP.

**Recommendation**

1. **CSS management compare and contrast their operating policies and practices with other counties in an effort to find ways to improve the performance of REP.**

**Output/Outcome Measures**

Performance measures may address the type or level of program activities conducted (process), the direct products and services delivered by a program (outputs), and/or the results of those products and services (outcomes). They are used to evaluate program effectiveness and to identify problem areas for corrective action.

CSS does not have clear and measurable performance criteria for all its program goals. For example, CSS has no measurable criteria for its goal of providing outreach and information to refugees about social service programs that would enhance their ability to overcome barriers to isolation. An output and outcome measure for this goal could include the number of outreach programs provided and the increase in participation by refugees in community activities, respectively. Without measurable criteria, the Department cannot determine its success in achieving REP goals. CSS management needs to ensure each program goal has clear and measurable performance criteria.

**Recommendation**

2. **CSS management ensure each program goal has clear and measurable performance criteria.**

**Program Monitoring**

Two CSS program monitors share the responsibility of monitoring the 13 REP agencies. To ensure agencies comply with the contract requirements, the program monitors divide their time between on-site agency visits and desk reviews. During on-site agency visits, program monitors review program files and participant data to ensure compliance with program, fiscal and contractual requirements. During desk reviews, program monitors review invoices and approve payments. The program monitors also act as consultants to the REP agencies by answering questions the agencies have on the REP program and their contract responsibilities. In January 2002, the program monitors began facilitating monthly agency training sessions to further assist the REP agencies.

### **Frequency of Site Visits**

The REP Monitoring Manual requires program monitors to conduct site reviews at each agency site(s) at least once each quarter. After terminating one agency in October 2001, CSS had 13 agencies with 30 sites. As seen in the table below, CSS is improving, but not yet meeting its goal of one site visit per quarter.

Quarter	Sites to be visited	Number of Sites Visited	% of Sites Visited
July -'01 – Sep. - '01	30	13	43%
Oct. '01 – Dec. '01	30	16	53%
Jan. '02 – Mar. '02	33 <sup>1</sup>	22	67%

CSS management stated that they are budgeted for three REP program monitors. However, they only have two monitors working because one of the assigned program monitors is out on a long-term leave. CSS management recognizes the importance of visiting each agency site and indicated they are currently working on assigning a program monitor to fill the third monitoring position. CSS management should replace the individual on long-term leave and ensure the Department completes at least one site review at each agency site(s) each quarter.

### **Recommendation**

- 3. CSS management replace the individual on long-term leave and ensure the Department completes at least one site review at each agency site(s) each quarter.**

### **Case File Reviews**

In reviewing the monitoring procedures, we noted the following:

- CSS management does not ensure that program monitors case reviews contain the minimum number of cases as specified in the REP Monitoring Manual. The CSS REP Monitoring Manual specifies that program monitors will review “10 or 10%” of the total current case files during a site visit. In some cases, we found program monitors reviewed only two cases at a site. Ensuring that the minimum number of cases are reviewed is important as it provides information to assist management in determining if agencies are complying with the terms of their County contracts.

<sup>1</sup> Contractors began assisting participants at three additional sites during this quarter.

- The Monitoring Manual states that case files to be reviewed should be pulled from current cases. We believe this should be further refined to require that cases to be reviewed be pulled from schedules of billed cases. It is important to verify that services actually billed are accurately and consistently documented.
- The REP database does not identify the number of active cases at the individual sites. It only identifies the total active cases for each agency, and a contactor may have multiple sites. Therefore, the program monitors are not able to determine what constitutes 10% of the total number of site case files. Both monitors told us that they do not ask agencies for a list of the active cases at the site. Instead, the program monitors ask where the files are kept and randomly pull files to review instead of selecting cases from prior billings. (CSS program management indicated that they are working on updating the CSS agency database to show the number of case files located at each agency site.)
- Program monitors currently allocate one day to each agency site. While at a site, program monitors also provide technical assistance to case managers. This technical assistance, while valuable, cuts into the program monitor's allocated case review time. Because only one day is allocated to a site visit, and since some case file reviews take longer to review than others, the program monitors stated they might review as few as two files during a site review. Reviewing such a small sample makes it difficult to determine the degree to which an agency is or is not complying with its County contract.
- As part of their site visits, program monitors do not independently verify information found in a participant's case file with the participant. Program monitors do speak with participants; however, these discussions are not used to verify information recorded in the case file.
- Monitors do not consistently report to the agency the total number of cases reviewed. In addition, the monitors do not maintain summary records of the total number of cases reviewed. If this information is requested, program monitors must find and review their case notes to ascertain the number of cases reviewed at each agency.

CSS management should ensure that program monitors review the minimum number of case files, updating the REP Monitoring Manual to include specific guidelines on how to select files and the length of time allocated to a site visit. Management also needs to ensure the manual includes specific requirements on interviewing participants and what monitors should document and report, both to agency management (at the time of a site visit) and to Department program management.

**Recommendations****CSS management:**

- 4. Ensure that program monitors review the minimum number of cases, requiring that monitors select participant files from lists of agency participant files from which the agency has billed for services.**
- 5. Ensure REP monitors allow a sufficient amount of time to each site review to complete the required number of participant file reviews.**
- 6. Ensure program monitors interview participants to ensure information found in the case file is accurate.**
- 7. Develop and include in the manual specific requirements on what is to be documented and reported, both to agency management (at the time of a site visit) and to Department/program management to document the results of individual file reviews and in summary.**

**Monitoring Agency Training Sessions**

Agencies provide various training sessions to REP participants. During a site visit, the program monitors are required to observe an agency's training sessions. However, the REP Monitoring Manual provides no guidance as to CSS management's expectations of these observations. CSS program monitors have developed their own procedures for observing agency training sessions. These procedures include observing clients signing the logs and confirming their identity.

To assist program monitors in performing their reviews, the Monitoring Manual should be revised to identify the minimum procedures the monitors should perform when observing the agency training sessions. These procedures could include:

- Collecting providers' monthly training schedules to determine the number of trainings to observe.
- Observing the sign-in process to ensure that the participants attend the training(s).
- Comparing the daily time schedule and topics being discussed at the training to the curriculum submitted to CSS.
- Ensuring that trainings are held in no more than two primary languages.
- Interviewing participants, documenting what the participants believe to be most beneficial about the program and where improvements could be made.

**Recommendation**

8. **CSS management revise the REP Monitoring Manual to include specific procedures relating to the monitors' observance of agency training sessions.**

**Activity Logs**

Based on their specific program requirements, REP participants must participate in REP activities between 32 and 35 hours a week. A participant's part-time employment counts toward this requirement. We noted that agencies do not require participants to submit copies of payroll stubs documenting the hours worked. In addition, the current REP contract requires agencies to document their plan of providing service activities for 32/35-hours per week, but it does not require the agencies to document that the services were actually provided.

However, program monitors developed an activity log to assist the agencies in tracking and documenting participant activities, and instructed the agencies to use these activity logs to document the hourly activity requirement. We noted that, during the first half of fiscal year 2001-02, 33% of all program monitor findings related to the maintenance of the activity logs. Program monitors found activity logs pre-signed by the participants, not properly completed or missing altogether.

CSS management indicated that they plan to revise the REP contracts to require participant activities to be recorded in the activity logs signed by the participant. CSS also should require agencies to maintain copies of participant pay stubs to document the hours worked each week by REP participants. During site visits, the monitors should review the pay stubs of participants engaged in part-time employment and observe participants completing the activity logs to ensure the logs are not pre-signed.

**Recommendations****CSS management:**

9. **Require that agencies maintain copies of all participant pay stubs in the appropriate participant's file when these hours are being used to support the 32/35 weekly activity participation requirement.**
10. **Ensure future REP contracts require agencies to record participant hours in an activity log signed by the participant at the time the activity occurs.**

- 11. Require monitors during site visits to review pay stubs of participants engaged in part-time employment and observe participants completing the activity logs to ensure the logs are not pre-signed.**

### **Agency Policy Manual**

At the beginning of each fiscal year, CSS holds a mandatory agency training session. During this session, the CSS REP program monitors provide agencies with samples of the required participant file documentation. Also, during monthly training sessions, program monitors provide the agencies and their case managers with any new or updated/revised information.

During our three agency visits, we observed that agency staff continues to have questions regarding the completion of certain forms. In April 1998, the 'California Initiative Report'<sup>2</sup> required all agencies (service providers) to maintain a policy manual, making it available to all contract staff. However, we found that CSS has not yet developed a refugee policy manual to be used by the agencies.

The development of an agency policy manual should assist agencies and their staff in complying with REP contract requirements. The manual should include completed examples (e.g., activity logs, etc.) annotated with what information is necessary. A policy manual used by agencies and staff as a reference guide may help reduce the number of questions currently fielded by program monitors and reduce the number of corrections necessary when program monitors perform case file reviews.

### **Recommendation**

- 12. CSS management develop a policy manual of agency policies and procedures and require that all REP agencies maintain a copy of the manual.**

### **Contracting Process**

To assist CSS in meeting its goals for REP, the Department contracts with service providers (agencies) that possess a knowledge base and experience in delivering social and employment training services. Every three years, CSS issues a Request for Proposals (RFP) that requests creative approaches and strategies from agencies that possess the skills to assist eligible individuals into self-sustaining employment, upwardly mobile career paths, higher earning potential and ultimately off welfare

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<sup>2</sup> Issued as the result of representatives from the Federal/State and County level reviewing refugee programs to determine ways to improve employment outcomes leading to self-sufficiency and to work in partnership to strengthen refugee families and communities.

dependency. In July 2001, CSS entered into a new three-year contract with 14 agencies. (One agency was terminated in October 2001.)

### **Evaluation Scoring Process**

CSS used a five-page evaluation instrument to evaluate and score each proposal received in response to the Refugee Employment Program RFP. Proposals were evaluated/scored in three categories: Applicant Experience and Capability, Program Plan, and Budget. We reviewed the evaluation instrument and noted that it contained objective, specific and meaningful criteria that coincided with the RFP. However, we noted the following areas where the contracting process could be improved.

- CSS did not include in the RFP the minimum passing score.

Management pre-determined that all proposals receiving a score of 70 points (out of a possible 100) would move on to the second phase of the evaluation process. However, this information was not included in the RFP.

- CSS raters did not always rate proposer experience and capabilities in a manner consistent with the RFP.

The RFP indicated that agencies under contract with CSS for the past two fiscal years would have their program performance in the Applicant Experience and Capability section calculated and scored by CSS management. CSS management did evaluate the performance of each of these agencies, and provided each evaluator with the results and suggested scores. However, we found evaluators did not always use these scores when rating the proposals. Instead, the evaluators frequently performed their own evaluations, independently arriving at their own score.

Bidders submit proposals based upon the information contained in the RFP. Future RFPs should include the minimum passing score if one is to be used and CSS management should ensure that pre-determined scores are used.

### **Recommendations**

#### **CSS management:**

- 13. Include in future Request for Proposals the minimum passing score if one is to be used.**
- 14. Input scores for areas where the Request for Proposals states that past performance will be calculated and scored by the Department.**



### **RFP Evaluation Teams**

CSS received 17 proposals and assigned 18 staff (in teams of two) to evaluate the proposals. Assignment of only two evaluators to a team could result in conflicting scores without a third score to provide a majority. CSS should increase the number of evaluators to a minimum of three.

Additionally, we noted that each team evaluated a maximum of three proposals. CSS management used the large number of evaluators because they believed it was unreasonable to request one team to evaluate all 17 proposals. While 15 of the 17 proposals passed the initial evaluation, assigning a maximum of three proposals to each team could have an impact on the overall proposal evaluation process. For example, if one team rates harder than the other teams, the proposals (agencies) assigned to that team could be significantly disadvantaged.

CSS should increase the minimum number of panel members to three and require each member of the team to evaluate each proposal. If the number of proposals is too large, management should consider having the panels each evaluate a separate component of each proposal. The review process should be closely supervised to ensure consistency. Team members should also receive comprehensive instructions on the use of the evaluation instrument and rating criteria.

### **Recommendations**

#### **CSS management:**

- 15. Ensure that each panel contains at least three members and that each panel member evaluates every proposal; or, if the number of proposals is too large, the same component(s) of every proposal.**
- 16. Ensure that evaluation panels receive comprehensive instructions on the use of the evaluation instrument and rating criteria and closely supervise the evaluation process to ensure consistency.**

### **Accuracy of Scores**

The 18 evaluators completed 40 individual evaluations during their evaluation of the 17 proposals. We re-calculated the scores of each of the 40 individual evaluations and found 5 (13%) were incorrectly totaled. One of these incorrectly totaled scores resulted in a proposal being inappropriately sent to the second round of evaluations and eventually being offered a contract worth \$50,000. (The score, when correctly added, was less than the passing score of 70.) This particular bidder elected not to accept the contract.

**Recommendation**

- 17. CSS management ensure that proposal scores are re-checked for accuracy.**

**Contract Renewals**

On June 12, 2001, CSS obtained Board of Supervisors' approval to contract with 14 REP providers to replace the contracts that were set to expire on June 30, 2001. However, as of July 1, 2001, CSS had still not signed six of the 14 REP contracts for the new fiscal year. Three of six contracts were not signed until two weeks into the new fiscal year, although the agencies continued to provide services. CSS staff cited difficulties in getting agency signatures as the reason for not getting all the contracts signed by the start date. To protect the interests of both the County and the contracting agencies, contracts need to be signed prior to work commencing.

**Recommendation**

- 18. CSS management ensure that service providers sign contracts before allowing them to perform contracted services.**

**Funding and Contract Awards**

The CSS evaluators passed 15 of the 17 proposals submitted on to the second phase of the evaluation process with a score of at least 70. During the second phase, CSS management allocated the funding to the proposers. One of CSS' goals is to ensure each supervisorial district has proper coverage for the service components (Attachment I lists the service components) and projected number of participants that live in each district.

CSS management considers the following factors when recommending funding to applicants:

- The total funds available to the program.
- The number of participants the agency indicates it can service. To the extent feasible, CSS attempts to give each agency a contract up to the maximum number of participants the agency states it can provide services to.
- The Supervisorial District(s) to be served by the agency.
- The agency's initial RFP score, which includes the ability of the agency to perform, past performance, program design, knowledge and experience with the targeted populations, job and work site commitments obtained and program accessibility to the refugee population to be served.

- The agency's compliance with proposal guidelines.
- The agency's ability to provide culturally and linguistically appropriate services.

At the conclusion of this analysis, CSS requests Board of Supervisors' authority to execute contracts with selected agencies. However, CSS did not maintain any documentation to support its funding decisions and could not provide the relevant importance of the individual factors or how they were applied in determining funding recommendations. Documentation of this process is necessary to ensure funding is allocated in a rational manner and to enable CSS to adequately support its decisions in the event of agency challenges.

### **Recommendation**

- 19. CSS management document the Refugee Employment Program evaluation process to ensure funding is allocated in a rational manner.**

### **Claiming**

#### **Delays in Claiming**

CSS receives Targeted Assistance, Refugee Employment Social Services and Asylee Set-Aside funding for the federal fiscal year (October 1 through September 30). For federal fiscal year 2001-02, the State allocated over \$6.3 million (including carryover funding) to CSS to provide outreach, case management and employment/training and placement services to refugees and asylees. The State reimburses CSS based on claims submitted. The State requests that counties submit claims on a consistent basis (either monthly or quarterly).

We noted that CSS does not submit its reimbursement claims to the State on a consistent basis. On average, CSS submits its claims more than 200 days after the end of the service month. Program monitors receive and review all agency invoices before submitting them to CSS' program accounting unit. We noted that program accounting receives invoices from the program monitors an average of 43 days after the end of the service month. It takes program accounting an average of 159 days to submit a claim after they receive the program invoices. This delay in claiming results in County General Fund monies not being reimbursed for almost seven months after services are provided.

Also, in discussions with the State, we were told that at the beginning of the funding service period impacted counties may request an advance up to 25% of their funding. Los Angeles County does not request an advance. Tracking agency invoices, submitting claims more timely and obtaining an advance would enhance the County's cash flow and facilitate program monitoring.

**Recommendations****CSS management:**

- 20. Require CSS staff to date stamp agency invoices when they are first received in the Department.**
- 21. Submit Refugee Employment Program reimbursement claims to the State at least quarterly.**
- 22. Request Refugee Employment Program funding advances.**

**Monitoring Administrative Expenditures**

Counties are allowed to claim actual expenditures up to 15% of the annual REP allocation for administrative expenditures (salaries and employee benefits and services and supplies). Counties receive a new REP allocation each federal fiscal year.

CSS management needs to better monitor its administrative expenses to ensure that all eligible administrative expenditures are charged to the REP program. In the past three allocation periods, we noted that CSS only claimed 23%, 24% and 54% of its allowable administrative expenditures during the first year of the two-year claiming period. During the same period the Department claimed 58%, 63 and 84% of its allowable program expenditures.

Further, during the past three allocation periods, we noted that in six different months CSS charged no salary and employee benefit (S&EB) expenditures for the month or charged a negative amount. (Two negative entries resulted in the S&EB charges for the three previous months being backed out.) CSS explained that adjustments were necessary to correct for actual time spent on other programs. However, this gives the perception that the Department arbitrarily applies expenditures to maximize the claiming of administrative costs. CSS has two monitors who are assigned to the program full time so it is unlikely there would be any months when no administrative costs would be charged to the program. CSS needs to ensure its administrative costs are accurately reflected to ensure appropriate claiming.

**Recommendation**

- 23. CSS management closely monitor REP expenditures and ensure that administrative expenditures are accurately recorded and charged to the Refugee Employment Program in the periods they are incurred.**

**Refugee Employment Program Agency Components**

**1. Pre-Employment Training (PET)**

*This 5-week component is designed to provide all refugees receiving Refugee Cash Assistance, General Relief (GR) or non-welfare poverty refugees with effective bilingual/interpretive employment training services that are culturally and linguistically appropriate to promote the participation, job placement and continuous employment of each participant in unsubsidized employment.*

**2. Pre-Employment English Language Training (PELT)**

*This component combines PET and English Language Training (ELT) into one classroom activity. Refugees referred to this component will be only those persons receiving RCA or GR assistance who need some ELT training to be placeable in employment.*

**3. Job Readiness/Job Search**

*Agency shall provide job readiness/job search activities with adequate interpretative services and translated materials sufficient to assist participants to fully participate.*

**4. Customized Employer Linked Training (CELT)**

*This program component provides short-term training (3 – 4 months) designed to meet the specific needs of an identified employer. This training may be conducted in a classroom setting and may include intensive employment oriented ELT. Placement wages must be \$1.25 an hour more than minimum wage.*

**5. Vocational Skills Training (VST)**

*This program component must provide culturally and linguistically appropriate vocational training for CalWORKS participants that will lead to rapid employment. The placement wages must be \$1.25 per hour more than minimum wage.*

**6. Work Experience (WEX)**

*This employment component is designed to serve non-job ready CalWORKS refugees who have minimal employment experience, skill deficiencies, limited English ability, and cultural and attitudinal barriers to employment. Through this component, refugees are provided unpaid work experience in a public or profit sector to give them basic job skills.*

**7. Selective Training and Employment Project (STEP) –STEP/R and STEP/C**

*This component is specifically designed for and serves the following refugees: Refugees fifty years of age and older with limited English ability and Refugees with two or more physical limitations, regardless of the person's age.*

**8. Aid to Family Self Sufficiency (AFSS)**

*This employment component is designed to provide specialized services for the spouse of a mandatory CalWORKS participant in REP. Enrollment in this program component will be voluntary, providing the mandatory participant is meeting the 35-hour per week participation requirement.*

**9. Employment Support Services (ESS)**

*This component provides additional employment support services to the various employment placement activities (PET, PELT, VST, CELT, STEP, etc). ESS will assist refugees in completing their employment training activity.*

**10. Central Intake Unit (CIU)**

*The service provider of this component is responsible for accepting mandatory referrals (RCS, CalWORKS) from the Los Angeles County Department of Public Social Services. The unit is responsible for determining the necessary services that a refugee needs to become self-sufficient and manages the refugee through the REP-funded services.*



ROBERT RYANS  
Director

## COMMUNITY AND SENIOR SERVICES OF LOS ANGELES COUNTY

BOARD OF SUPERVISORS

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DON KNABE  
MICHAEL D. ANTONOVICH

November 14, 2002

To: J. Tyler McCauley  
Auditor-Controller

From: Josie Marquez, Director  
Employment & Training 

Subject: REFUGEE EMPLOYMENT PROGRAM REVIEW

We have completed our assessment of the Department of Community & Senior Services (CSS) Program Review submitted to my office in November 2002. Your review focused on program performance measures, policies and procedures, monitoring and administrative oversight of the Refugee Employment Program.

Overall, we agree with this Review's findings, comments and recommendations. Our responses which include planned corrective action, are attached. If you have any questions, please contact me at (213) 738-3175 or Hilda Guillen at (213) 738-3991.

JM:rg

Attachment

Community and Senior Services (CSS)  
Refugee Employment Program Review  
Response to Recommendations

**Recommendation 1**

**CSS management compares and contrast their operating policies and practices with other counties in an effort to find ways to improve the performance of REP.**

**CSS Response**

We concur with the A-C's recommendation. CSS management will work with other counties to compare and contrast their operating policies and practices. CSS will start with the Sacramento Employment and Training Agency (SETA), the agency responsible for planning and administering the refugee grants in Sacramento County, and offers core services similar to those in Los Angeles County, to gain a better understanding of their operating policies and practices in an effort to improve the performance of our REP.

Target date for implementation: July 2003.

**Recommendation 2**

**CSS management ensures each program goal has clear and measurable performance criteria.**

**CSS Response**

We concur with the A-C's recommendation. CSS will establish controls that ensure the REP goals have clear and measurable performance criteria.

Target date for implementation: July 2003.

**Recommendations 3 and 5**

**CSS management:**

- 3. Replace the individual on long-term leave and ensure the Department completes at least one site review at each agency site(s) each quarter.**
- 5. Ensure REP monitors allow a sufficient amount of time to each site review to complete the required number of participant file reviews.**



### **CSS Response**

We concur with the A-C's recommendations. As part of the Department's strategic plan, CSS has developed a standardized monitoring program and has already instituted a policy, which address the frequency for which all program monitors are to schedule reviews as of July 2002. The basic requirement of the program entails conducting at a minimum, one (1) monitoring site visit/review for each quarter, which is consistent with the frequency policy already established in the REP Monitoring Manual. In addition, monitors will be given a two (2) day timeframe to each site review. This will ensure that monitors have sufficient time to conduct their site review thoroughly.

CSS has since assigned a program monitor to fill the third monitoring position for the REP program. This position will be in full effect as of January 2003.

Target date for implementation: January 2003.

### **Recommendations 4 and 6**

#### **CSS management:**

- 4. Ensure that program monitors review the minimum number of cases, requiring that monitors select participant files from lists of agency participant files from which the agency has billed for services.**
- 6. Ensure program monitors interview participants to ensure information found in the case file is accurate.**

### **CSS Response**

We concur with the A-C's recommendations. CSS has since instituted policies and procedures that will allow program monitors to review and validate program services provided as well as monthly billings since July 2002. These procedures require that monitors thoroughly conduct desk reviews of invoice amounts billed to CSS by using a newly installed Oracle system which tracks the participants through every component. Each service provider must input all information of the participant during the process as it occurs and the billing is generated from this system. This measure will ensure that actual clients are receiving the services for which the contractor is billing the Department.

Target date for implementation: January 2003.

### **Recommendations 7 and 8**

#### **CSS management:**

- 7. Develop and include in the manual specific requirements on what is to be documented and reported, both to agency management (at the time of a site visit) and to Department/program management to document the results of individual visits and in summary.**
- 8. Revise the REP Monitoring Manual to include specific procedures relating to the monitors' observance of agency training sessions.**

### **CSS Response**

We concur with the A-C's recommendations. All program monitors will use the Department's standardized monitoring instrument as a basis for conducting reviews. The Department will review the program monitoring instruments and revise them to follow the general provisions of the Department's standard instrument while incorporating program-specific requirements. A standardized letter of findings will also be used by all of the Department's program monitors. In addition to this instrument, monitors will be required to create a narrative of the site review. This narrative will include but is not limited to the following: entrance/exit conference with provider, interaction with participants, training sessions, technical assistance, etc. Upon management's approval, a copy of the narrative will be sent to the service provider along with the monitoring report. CSS will work with the Auditor-Controller's office to ensure that these tools comply with all provisions necessary to effectively monitor all contractors.

Target date for implementation: January 2003.

### **Recommendations 9, 10, and 11**

#### **CSS management:**

- 9. Require that agencies maintain copies of all participant pay stubs in the appropriate participant's file when these hours are being used to support the 32/35 weekly activity participant requirement.**
- 10. Ensure future REP contracts require agencies to record participant hours in an activity log signed by the participant at the time the activity occurs.**

11. **Require monitors during site visits to review pay stubs of participants engaged in part-time employment and observe participants completing the activity logs to ensure the logs are not pre-signed.**

**CSS Response**

We concur with the A-C's recommendations. CSS requires agencies to maintain copies of all participant pay stubs in participant files documenting the number of hours worked and when these hours are being used to support the 32/35 weekly activity participation. In addition, the Department's standardized monitoring instrument required that program monitors ensure that participant files contain the necessary pay stubs for participants who are employed and activity logs are not pre-signed. Monitors have now extended their monitoring to include observing the classroom training and observing the participants actually signing in and out on the activity logs.

Implementation date:       October 2002.

**Recommendation 12**

**CSS management develop a policy manual of agency policies and procedures and require that all REP agencies maintain a copy of the manual.**

**CSS Response**

We concur with the A-C's recommendation. Although CSS had developed a policy manual of agency policies and procedures, this manual was implemented during our training sessions with the case managers and it was required that all REP agencies maintain a copy of this manual since July 2002. CSS is currently developing a more comprehensive manual that provides the service providers with a detailed policy using the new Oracle System. This manual will take the service provider through the process and all the requirements as they input the data in the system. CSS will continue to improve the current policy and procedure manual to include a step by step process that includes all possible scenarios. It will be further enforced during each monitoring visit and require that the policy manual be available to all contract staff, with each having a copy at their own desk for easy access.

Target date for implementation:   July 2003.

### **Recommendations 13, 14, 15, 16, and 17**

#### **CSS management:**

- 13. Include in future Request for Proposals the minimum passing score if one is to be used.**
- 14. Input scores for areas where the Request for Proposals states that past performance will be calculated and scored by the Department.**
- 15. Ensure that each panel contains at least three members and that each panel member evaluates every proposal; or, if the number of proposals is too large, the same component(s) of every proposal.**
- 16. Ensure that evaluation panels receive comprehensive instructions on the use of the evaluation instrument and rating criteria and closely supervise the evaluation process to ensure consistency.**
- 17. Ensure that proposal scores are re-checked for accuracy.**

#### **CSS Response**

We concur with the A-C's recommendations. CSS will require contract managers to ensure that future Request for Proposals (July 2004) will include the following requirements:

- Minimum passing score either in points and/or percentage of the total points/percentage possible;
- Any pre-determined scores given will be entered on the form for each of the agencies accordingly, before being passed on to the evaluators;
- Each team will contain a minimum of three (3) evaluators. In addition, each team will be responsible to evaluate the same section(s) for all proposals according to his/her experience/expertise;
- Team members will be receiving comprehensive training and instructions on the use of the evaluation instrument and rating criteria; and
- There will be a team consisting of at least two (2) members to ensure that each proposal scores are accurately totaled.

Target date for implementation: July 2003.

### **Recommendation 18**

**CSS management ensure that service providers sign contracts before allowing them to perform contracted services.**

### **CSS Response**

CSS has ensured that all contracts with service providers will be signed before allowing them to provide contracted services. Service providers have been notified of this requirement.

Implementation Date: July 2002.

### **Recommendation 19**

**CSS management document the Refugee Employment Program evaluation process to ensure funding is allocated in a rational manner.**

### **CSS Response**

CSS will revise the current policy and procedure of the evaluation process for the Refugee Employment Program to ensure funding allocations are allocated fairly and accurately to each service provider. The procedure will clearly identify the formula used to calculate each allocation. Procedure will be in place for the next RFP process in FY 2004.

Targeted date for implementation: July 2003

### **Recommendations 20, 21, and 22**

**CSS management:**

- 20. Require CSS staff to date stamp agency invoices when they are first received in the Department.**
- 21. Submit Refugee Employment Program reimbursement claims to the State at least quarterly.**
- 22. Request Refugee Employment Program funding advances.**

### **CSS Response**

We concur with the A-C's recommendations. REP program invoices will now be generated from the Oracle System, which will include the date of the invoice and

the monitors will also clock in the date in back of each invoice when received to ensure timely submission of invoices. REP analysts will follow-up with the accounting unit to ensure that reimbursements have been submitted in a timely manner to the State.

Target date for implementation: December 2002.

### **Recommendation 23**

**CSS management closely monitor REP expenditures and ensure that administrative expenditures are accurately recorded and charged to the Refugee Employment Program in the periods they are incurred.**

### **CSS Response**

We concur with the A-C's recommendations. CSS staff assigned to REP must charge their actual hours worked under the Refugee Employment Program on their timecard. CSS management and supervisory staff will closely review, monitor and approve the time charged for accuracy. The Department generates a monthly cost statement report for each of its funded programs including the Refugee Employment Program. The REP cost statement report reflects actual administrative expenditures for staff, services and supplies for the periods they are actually incurred.

Implementation date: October 2002